

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JANNETTE GONZALEZ CLAUDIO

DEBTOR

CASE NO 15-09164/ESL

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS
DOCKET NO. 36 and
REQUEST FOR EXTENSION OF TIME TO CURE BALANCE ON PLAN ARREARS**

TO THE HONORABLE COURT:

COMES NOW, JANNETTE GONZALEZ CLAUDIO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, dated March 9, 2018, Docket No. 36, basically stating that the debtor is in arrears in the Plan payments in the sum of \$1,470.00.

2. The Debtor hereby replies to the Trustee's motion respectfully stating that on March 28, 2018, the Debtor made a \$980.00 Plan payment to the Trustee to partially cure the Plan arrears. Attached is evidence of confirmation no. 286561270.

3. The Debtor is still in arrears in the Plan payments (\$490.00) and the Debtor proposes to cure these arrears within thirty (30) days.

4. Based on the aforementioned, the debtor respectfully requests an additional extension of time of thirty (30) days within to cure the balance owed on the Plan arrears and inform the Court, accordingly. This extension of time to expire on May 2, 2018.

WHEREFORE Debtor respectfully prays this Honorable Court grant the present reply to the *Trustee's Motion to Dismiss*, and grant the requested extension of time.

Page - 2-
Debtors' Reply to Trustee's Motion to Dismiss
Case no. 15-09164/ESL13

I HEREBY CERTIFY that on this same date a copy of this notice was electronically filed with the Clerk of the Court using CM/ECF system which will send notifications of such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: Debtor, Jannette González Claudio, PO Box 1177, San Lorenzo, PR 00754, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 2nd day of April, 2018.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
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From: "Janet Gonzaga" <luisjean.gonzaga39@gmail.com>
Date: Monday, April 2, 2018 11:43 AM
To: <dimaris@rfclawpr.com>
Subject: Fwd: Payment Confirmation. 15-09164

Jeannette Gonzalez Claudio

Enviado desde mi iPhone

Inicio del mensaje reenviado:

De: epayment@ch13-pr.com
Fecha: 28 de marzo de 2018, 2:42:28 p.m. GMT-4
Para: luisjean.gonzaga39@gmail.com
Asunto: Payment Confirmation
Responder a: epayment@ch13-pr.com

Dear Jannett ,

Thank you for using the JOSE CARRION TRUSTEE CHAPTER 13 DIVISION payment service. This is to confirm your authorization, on Mar 28,2018 at 14:41, for electronic debit from your funding account payable to JOSE CARRION TRUSTEE CHAPTER 13 DIVISION. The following account(s) will be paid, in the total amount of \$981.00.

Account Number: 1509164
Confirmation Number: 286561270
Effective Date: Mar 28,2018
Payment Amount: \$980.00
Fee: \$1.00

If you have any questions, concerns or require clarification regarding this correspondence, please call 787-977-3535.